

JD:NJM

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. §§ 1951(a), 924(c)(1)(A)(ii), 2  
and 3551 et seq.)

KARL CLARKE,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

FINBARR FLEMING, being duly sworn, deposes and states that he is a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), duly appointed according to law and acting as such.

In or about January 2018, within the Eastern District of New York, the defendant KARL CLARKE, together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of United States currency from one or more employees of one or more gas stations and laundromats located in Kings, Queens, Richmond and Nassau Counties, New York.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

In or about January 2018, within the Eastern District of New York, the defendant KARL CLARKE, together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to one or more crimes of violence, to wit: one or more violations of Title 18, United States Code, Section 1951(a), and did knowingly

and intentionally possess such firearms in furtherance of said crimes of violence, one or more of which firearms was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 2 and 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Task Force Officer ("TFO") with the ATF. I have been a TFO since 2014 and have served in the New York City Police Department ("NYPD") in roles including detective, investigator and police officer for approximately 23 years. I have been involved in the investigation of numerous cases involving robberies and firearms offenses.

2. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation. Unless otherwise noted, wherever in this Affidavit I assert that a statement was made, the information was provided by another agent or law enforcement officer or witness who may have had either direct or hearsay knowledge of that statement and to whom I or others have spoken or whose reports I have read and reviewed. Such statements are among many statements made by others and are stated in substance and in part unless otherwise indicated.

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

3. I and other law enforcement agents have been investigating the armed robberies of laundromats, gas stations, and other commercial establishments in Staten Island, Queens, Brooklyn, and Nassau County, New York.

4. On or about January 26, 2018, at approximately 11:15 p.m., two male perpetrators robbed a laundromat located at 537 Conduit Boulevard in Brooklyn, New York (the “Conduit Boulevard Robbery”). The perpetrators, one of whom simulated possession of a firearm, took United States currency from one or more employees of the laundromat.

5. On or about January 27, 2018, at approximately 4:15 a.m., two male perpetrators robbed a gas station located at 1774 Victory Boulevard, Staten Island, New York (the “Victory Boulevard Robbery”). Based on my review of law enforcement reports, one of the perpetrators displayed a firearm and the robbers took currency from one or more employees of the gas station.

6. On or about January 27, 2018, at approximately 5:15 a.m., two male perpetrators robbed a gas station located at 758 Franklin Avenue, Valley Stream, New York (the “Franklin Avenue Robbery”). Based on my review of law enforcement reports, one of the perpetrators placed what the employee believed was a handgun to the back of the employee’s head. The perpetrators then removed currency, a small safe containing lottery tickets, and a cellular phone from the store.

7. On or about January 27, 2018, at approximately 6:15 a.m., two male perpetrators attempted to rob a laundromat located at 82-75 Parsons Boulevard in Queens, New York (the “Parsons Boulevard Attempted Robbery”). Based on my review of law enforcement reports, one of the perpetrators held a gun in his hand while the two robbers attempted to remove the cash register from the location.

8. In connection with an earlier robbery, law enforcement authorities received information implicating the defendant and prepared a six-photograph array containing the defendant's photograph. An employee of a gas station located at 138-50 Hillside Avenue in Queens, New York, identified the defendant KARL CLARKE as the individual who had robbed the gas station on or about January 18, 2018 (the "Hillside Avenue Robbery").

9. Based in part on the identification of the defendant as the perpetrator of the Hillside Robbery, members of the NYPD arrested the defendant on or about January 30, 2018.

10. Upon his arrest, the defendant KARL CLARKE was informed of and waived his Miranda rights. CLARKE admitted to committing or participating in approximately 10 robberies of commercial establishments in the Eastern District of New York, including the Conduit Boulevard Robbery, the Victory Boulevard Robbery, the Franklin Avenue Robbery, the Parsons Boulevard Attempted Robbery, and the Hillside Avenue Robbery. The defendant further admitted that he brandished a revolver during the Parsons Boulevard Attempted Robbery.

11. Upon information and belief, the gasoline sold at the gas stations robbed in the Victory Boulevard, Franklin Avenue, and Hillside Avenue Robberies typically travels in interstate or foreign commerce, and the laundromats targeted in the Conduit Boulevard Robbery and the Parsons Boulevard Attempted Robbery purchase materials and transact in interstate or foreign commerce.

WHEREFORE, your deponent respectfully requests that the defendant KARL CLARKE be dealt with according to law.

S/ Finbarr Fleming

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FINBARR FLEMING

Task Force Officer

ATF Joint Robbery Task Force

Sworn to before me this  
31st day of January, 2018

S/ Marilyn Go

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THE HONORABLE MARILYN D. GO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK